

**Commingling Beds**  
**State Licensure Only Beds and Certified Distinct Part**

In the past, Nursing Facility (Title 19 NF – Medicaid) beds and Non-Certified Comprehensive (NCC) beds could be co-mingled in a facility providing that the facility could identify the Title 19 NF beds at any given time, and that the facility did not exceed the number of Title 19 NF beds that it was certified for.

The Centers for Medicare and Medicaid Services (“CMS”) State Operations Manual (“SOM”) Section 2762.5 now includes Nursing Facility (NF Title 19) beds as a “Distinct Part” (please refer to the section concerning “Distinct Part SNF and/or NF”). A Distinct Part, as defined in Section 2762.5 of the CMS SOM, is a certified component of a facility that is separately recognized for the purpose of participation in Medicare or Medicaid.

Based upon the definition of a Distinct Part and the requirements thereof, State Licensure Only beds (Non-Certified Comprehensive (NCC) and Residential Level of Care beds) should not be commingled with Distinct Part (SNF and/or NF) beds.